

MONTGOMERY McCracken
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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

EVERGREEN SHIPPING AGENCY
(AMERICA) CORPORATION f/k/a
EVERGREEN AMERICA CORPORATION,

Plaintiff,

- against -

GLOBAL SHIPPING AGENCIES, S.A. and
GLOBAL SHIPPING AGENCIES S.A.S.,

Defendants

Civil Action No.:
19 Civ. 4958 (MCA)(SCM)

**NOTICE OF MOTION FOR ENTRY
OF A DEFAULT JUDGMENT**

TO: GLOBAL SHIPPING AGENCIES S.A.
GLOBAL SHIPPING AGENCIES S.A.S.
Carrera 43 A 1 A Sur 69 Interior 703
Medellin, Antioquia, Colombia.

PLEASE TAKE NOTICE that on a date and time to be set by this Court, the undersigned attorneys for Plaintiff EVERGREEN SHIPPING AGENCY (AMERICA) CORPORATION (“Evergreen”), shall apply to the United States District Court for the District of New Jersey, at the Martin Luther King Jr., Federal Building Courthouse, Newark, New Jersey 07102, for an Order: (i) granting the entry of Default Judgment against Defendants GLOBAL SHIPPING AGENCIES, S.A. and GLOBAL SHIPPING AGENCIES S.A.S. (collectively “GSA”); (ii) compelling GSA to arbitrate in New Jersey with application of the rules of the

Society of Maritime Arbitrators; and (iii) appointing an arbitrator on GSA's behalf for the New Jersey arbitration.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Evergreen will rely upon the Memorandum of Law and Declaration of Counsel, with exhibits annexed thereto, filed herewith in support of this motion.

Dated: New York, New York
April 18, 2019

Montgomery McCracken Walker & Rhoads LLP
Attorneys for Plaintiff

By: /s/ Eric Chang
Eric Chang
echang@mmwr.com

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New York, NY 10022
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CERTIFICATE OF SERVICE

The undersigned declares under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen years and I am not a party to this action.
2. On April 18, 2019, I served a complete copy of Plaintiff's NOTICE OF MOTION FOR ENTRY OF A DEFAULT JUDGMENT, DECLARATION OF ERIC CHANG IN SUPPORT OF PLAINTIFF'S MOTION FOR ENTRY OF A DEFAULT JUDGMENT (with exhibits thereto), and MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S MOTION FOR ENTRY OF A DEFAULT JUDGMENT, by enclosing and mailing same to the below parties by U.S. Mail and by FedEx service:

GLOBAL SHIPPING AGENCIES S.A.
GLOBAL SHIPPING AGENCIES S.A.S.
Carrera 43 A 1 A Sur 69 Interior 703
Medellin, Antioquia, Colombia.
For the attention of the legal representative
PANIAGUA & TOVAR ABOGADOS S.A.
Mr. MARIO FELIPE TOVAR ARAGON

/s/ Eric Chang
Eric Chang

Dated: April 18, 2019
New York, New York